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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

PATRICK JURDON	)	Case No.: 1:23-cv-01695-KES-SKO
	)	
PLAINTIFF,	)	<b>JOINT STIPULATION TO EXTEND PRE-</b>
vs.	)	<b>TRIAL DEADLINES; ORDER MODIFYING</b>
	)	<b>SCHEDULING ORDER</b>
CITY OF HANFORD; CITY OF HANFORD	)	
POLICE DEPARTMENT; PARKER SEVER, <i>In</i>	)	(Doc. 29)
<i>His Individual and Official Capacity</i> ; GABRIEL	)	
JIMENEZ, <i>In His Individual Capacity</i> ; JAMES	)	
LUTZ, <i>In His Individual Capacity</i> ; KARL	)	
ANDERSON, <i>In His Individual Capacity</i> ; JAMES	)	
EDLUND, <i>In His Individual Capacity</i> ; AND	)	
DOES 1 THROUGH 50, INCLUSIVE,	)	
	)	
DEFENDANTS.	)	
	)	
	)	

Pursuant to Federal Rule of Civil Procedure 16(b)(4), Plaintiff Jason Stingley ("Plaintiff") and all named Defendants, City of Hanford, et al. ("Defendants") (collectively, the "Parties") submit this Joint Stipulation to extend all deadlines in the above-captioned matter.

1       **WHEREAS**, Plaintiff propounded discovery requests to Defendant, City of Hanford on May  
2 9, 2024;

3       **WHEREAS**, on May 21, 2024, parties filed Proposed Stipulated Protective Order;

4       **WHEREAS**, on May 23, 2024, The Court denied parties' Proposed Stipulated Protective  
5 Order;

6       **WHEREAS**, Parties received scheduling order on May 28, 2024 [DOC 25] in this matter;

7       **WHEREAS**, on July 23, 2024, parties filed Proposed AMENDED Stipulated Protective  
8 Order;

9       **WHEREAS**, on July 26, 2024, The Court denied parties' Proposed AMENDED Stipulated  
10 Protective Order.;

11       **WHEREAS**, on August 7, 2024, Defendant City of Handford produced partial responses with  
12 the understanding that more documents would be produced after the stipulated protective order was  
13 signed;

14       **WHEREAS**, on October 14, 2024, Defendant City of Hanford's amended response to Patrick  
15 Jurdon's request for production of documents, set one;

16       **WHEREAS**, the parties have been working collaboratively to schedule depositions but have  
17 been hampered by trial schedules and the coming holidays;

18       **WHEREAS**, the parties have selected a mediator and tentative dates for mediation and  
19 believe mediation will be most productive after some but not all depositions are completed;

20       **WHEREAS**, the parties have met and conferred and have agreed to a 90-day extension of  
21 time for all the pre-trial deadlines;

22       **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between the Parties,  
23 through their attorneys of record that:

Event	Current Deadline	New Deadline
Non-expert Discovery Cutoff	January 29, 2025	April 29, 2025
Expert Disclosure	March 13, 2025	June 11, 2025
Expert Discovery Cutoff	May 19, 2025	August 17, 2025

Non-Dispositive Motion Deadline	June 9, 2025	September 7, 2025
Dispositive Motion Deadline	June 23, 2025	September 21, 2025

DATED: December 9, 2024

LAW OFFICES OF BONNER & BONNER

/s/ A. Cabral Bonner

A. CABRAL BONNER

Attorneys for Plaintiff PATRICK JURDON

Dated: December 9, 2024

GRISWOLD, LaSALLE, COBB, DOWD & GIN, L.L.P.

By: /s/ Christina G. Di Filippo

CHRISTINA G. DI FILIPPO

Attorneys for: Defendants, City of Hanford, et al.

**ORDER**

In view of the parties' foregoing stipulation to extend pre-trial deadlines (Doc. 29), and for good cause shown (Fed. R. Civ. P. 16(b)(4)), it is hereby ORDERED that the Scheduling Order (Doc. 25) is MODIFIED as follows:<sup>1</sup>

<b>Event</b>	<b>Current Deadline</b>	<b>New Deadline</b>
Non-Expert Discovery Cutoff	January 29, 2025	April 29, 2025
Expert Disclosures	March 13, 2025	June 11, 2025
Rebuttal Expert Disclosures	April 16, 2025	July 15, 2025
Expert Discovery Cutoff	May 19, 2025	August 17, 2025
Non-Dispositive Motion Filing Deadline	June 9, 2025	September 5, 2025
Non-Dispositive Motion Hearing Deadline	July 16, 2025	October 15, 2025
Dispositive Motion Filing Deadline	June 23, 2025	September 19, 2025
Dispositive Motion Hearing Deadline	July 28, 2025	October 29, 2025
Deadline to Provide Proposed Settlement Conference Dates	October 21, 2025	January 26, 2026, or 90 days before trial, whichever is later
Pretrial Conference	November 17, 2025	February 23, 2026, at 1:30 p.m.
Trial	January 21, 2026	April 21, 2026, at 8:30 a.m.

IT IS SO ORDERED.

Dated: **December 9, 2024**

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE

<sup>1</sup> Some of the parties' proposed dates were modified to comport with the Court calendar. In addition, although the parties did not request an enlargement of the motion deadlines and pretrial and trial dates, such enlargement is necessary to allow the Court time to adjudicate motions and for the parties to prepare for trial.